

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARBER CONSULTANTS LLC,

Plaintiff,
-against-

G.O.A.T. PRODUCTS LLC, et al

Defendants.

Case No.: 22-cv-6045

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/11/2023

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT G.O.A.T. PRODUCTS LLC**

NOW COMES Plaintiff, by and through counsel, and in support of its instant Motion for Entry of Default Judgment, states as follows:

1. Plaintiff initiated this action on July 18, 2022, see ECF #6, 7, and 8.
2. Defendant G.O.A.T. Products LLC (herein “GOAT”) was served on July 26, 2022, and an Affidavit of Service was filed on July 27, 2022. See ECF #10.
3. Defendant GOAT has not properly answered or had counsel appear on its behalf, despite being given many opportunities to do so by this Court.
4. A Clerk’s Certificate of Default was entered by the Court Clerk on August 28, 2023. See ECF #54.
5. As per SDNY Electrotonic Case Filing Rules and Instructions, specifically Rule 16.2, Plaintiff now files this Motion for Default Judgment.

MEMO ENDORSED

WHEREFORE, Plaintiff respectfully requests that this Court GRANT its instant Motion and enter a default judgment against Defendant GOAT.

Respectfully Submitted,

/S/ Solomon M. Radner
Solomon M. Radner (P73653)
RADNER LAW GROUP, PLLC
Attorney for Plaintiff
17515 West 9 Mile Rd, Ste 1050
Southfield, MI 48075
T: (877) 723-6375 * F: 866-571-1020
solomon@radnerlawgroup.com

DATED: Sept. 5, 2023

CERTIFICATE OF SERVICE

The undersigned certifies that on 9/5/23 the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on this Court's docket sheet, and also by:

 Overnight Courier Fax X E-mailed
 Hand Delivered U.S. Mail X E-filed
 Certified Mail Scanned Other

To: Michelle Winowich at michelle.winowich@gmail.com

Signature: /s/ Solomon M Radner

Plaintiff's motion for Default Judgment is DENIED without prejudice to renew in accordance with the Court's Individual Rule's Rule 3(J), Attachment A attached thereto, and ECF Rule 16.3. The Clerk of Court is respectfully directed to terminate the motions at ECF No. 55 and, in light of ECF No. 48, ECF No. 47.

Dated: September 11, 2023

White Plains, NY

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE